

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA, }
 }
Plaintiff, }
 }
vs. } CIVIL ACTION NO.: 2:06cr169-WKW
 }
DEMETRIA MILLS, }
 }
Defendant. }
 }

PETITION FOR HEARING TO ADJUDICATE THE VALIDITY
OF THE INTEREST OF TITLEMAX OF ALABAMA, INC.
IN THE PROPERTY ORDERED FORFEITED

TitleMax of Alabama, Inc. hereby moves this Honorable Court for the entry of an order to adjudicate the validity of its interest in one 2002 Chevrolet Tahoe, VIN 1GNEC13Z54R236758 at issue. In support hereof, TitleMax of Alabama, Inc. would show as follows:

1. TitleMax acquired a lienhold interest in the property at issue on February 10, 2005 when Demetria Mills pawned the vehicle at issue. A copy of the pawn agreement is attached hereto as Exhibit 1 and a copy of the title is attached as Exhibit 2.
2. From and after that date Demetria Mills has renewed that transaction with the last renewal being on October 28, 2005. Because no further payment has been made, under Alabama law the vehicle has become the property of TitleMax of Alabama, Inc.

3. TitleMax loaned to Mills the amount of \$3,500 to obtain its lien interest in the property. At that time, TitleMax had no cause to believe that the property was subject to forfeiture. [Affidavit of Chauncey Teague, Exhibit 3].

Wherefore, from all of the above, TitleMax of Alabama, Inc. hereby moves this Honorable Court for the entry of an order setting this matter for hearing and amending the preliminary order of forfeiture to provide for the protection of the interest of TitleMax of Alabama, Inc. in the property at issue.

Respectfully submitted,

s/ Jeffrey L. Ingram
Jeffrey L. Ingram (ING025)
Attorney for TitleMax of Alabama, Inc.

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have mailed a copy of the above and foregoing pleading upon all counsel of record in this cause, to their proper office addresses, as shown below, on February 11, 2008:

Mr. A. Clark Morris
Mr. John T. Harmon
U.S. Attorney's Office
Post Office Box 197
Montgomery, Alabama 36101-0197

s/ Jeffrey L. Ingram